

# EXHIBIT OO

**To:** Gregg Roman[Roman@meforum.org]  
**Cc:** Marc Fink[fink@meforum.org]  
**From:** Daniel Pipes[Pipes@MEForum.org]  
**Sent:** Fri 11/2/2018 11:51:03 PM (UTC)  
**Subject:** Allegations and conclusions

Dear Gregg:

As you know, there have been several allegations of improper conduct directed against you. The Middle East Forum takes these allegations very seriously. Accordingly, I investigated this matter yesterday, immediately upon learning of it.

Here is what I found: Three women who work for you – Lisa, Tricia and Marnie – say that you made unwanted sexual advances toward them. You maintain that you never made such advances and did not know they felt uncomfortable. But you acknowledge that your conduct, whatever your intentions were, was not acceptable and put these employees in a difficult position.

You put this in the context of calling yourself a “social junkie” who seeks constant social interaction. You acknowledge this drive led to melding together your business and personal relationships with staffers, male and female alike. You acknowledge that this melding must cease immediately and that you will limit yourself, within reason, to professional relations with MEF staff, fellows, and interns.

In light of the forgoing and considering the stated wishes of these three staffers to go on with their work at MEF, I propose a new structure governing the employment relationship between you and female staffers: no contact outside of business hours other than using MEF e-mail. That means no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth. And even during business hours, interactions will be business-related, within reason.

Furthermore, you agree that there will be no retaliation against these three employees whatsoever, now or in the future, for them informing me of this matter; while they agree immediately to inform me directly in the future about any problems concerning you.

You acknowledge that if there is a future case of a credible unwanted sexual advance by you toward a female staffer under your supervision, you will be fired immediately.

Finally, I ask you to respond to this question:

Do you agree to my proposed new structure governing the employment relationship between you and female staffers? If not, please propose additional/alternative structures.

I'd appreciate a quick reply that you accept these terms, as we are trying to close this matter as soon as possible. Thank you for your cooperation.

Yours sincerely,

Daniel Pipes

cc: Marc Fink

*The Middle East Forum is a publicly supported, 501(c)3 nonprofit organization, working to promote American interests and protect Western values. Your support helps us further our mission of educating Americans about the Middle East and influencing U.S. policy towards that region.*

---

**From:** Daniel Pipes  
**Sent:** Sunday, November 4, 2018 11:34 AM  
**To:** Tricia McNulty  
**Cc:** Marc Fink  
**Subject:** Allegations and consequences

Dear Tricia:

I am responding to the allegations you raised on Nov. 1 of improper conduct by Gregg. The Middle East Forum takes these allegations very seriously.

I have investigated this matter and found the following: You say that Gregg made unwanted sexual advances toward you. Gregg maintains that he never made such advances.

But, on learning your reaction, he acknowledges that his conduct was unacceptable and put you in a difficult position. Gregg put this in the context of calling himself a "social junkie" who seeks constant social interaction. He acknowledges this drive led to melding together his business and personal relationships with staffers, male and female alike; he also acknowledges that this mixing of business and personal relations must cease immediately.

In light of the forgoing and considering your stated wish to go on with your work at MEF, I propose several changes:

1. Gregg is no longer your supervisor; if he were to become that again in the future, it would only be with your consent.
2. During business hours, you both agree to limit yourselves, within reason, to professional relations.
3. Outside of business hours, you both agree to no contact other than using MEF e-mail: that is, no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth.

Gregg agrees that there will be no retaliation against you whatsoever, now or in the future, for you informing me of this matter. You agree not to wait months to inform me about any problems in the future concerning Gregg, but to do so immediately.

Gregg has been told and accepts that if there is a future case of a credible unwanted sexual advance by him toward a female staffer under his supervision, he will be fired immediately.

In the interests of documenting precisely what happened, I request that you send me a written account of what you already told me about Gregg's unwanted advances toward you.

Finally, I ask you to respond to three questions:

1. Do you agree to my proposed three changes? If not, please specify.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request?
3. Do you consider this matter satisfactorily resolved?

Thank you for bringing this matter to my attention, and for your cooperation.

Yours sincerely,

Daniel Pipes

1. Do you agree to my proposed three changes? If not, please specify.
  - a. I agree that Gregg will no longer be my supervisor and we will have no outside communication. However, much of my work is directly related to Gregg and his affairs. I do not understand how this will be possible unless there is a change in my duties.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request?
  - a. I am satisfied with the speed of inquiry yet disappointed in the discovery aspect of the incident. I will, as requested, submit a separate detailed description of the events that occurred on March 14 in addition to all corroborating evidence.
  - b. I believe it would be valuable for you or Marc to speak to every office employee regarding Gregg's behavior and the office environment.
  - c. As stated above, I do not believe it will be beneficial to have Gregg operate out of the central office. There is no scenario where I believe his presence will have a positive outcome.
3. Do you consider this matter satisfactorily resolved?
  - a. I am currently unable to answer this because I am unaware of the final details of the proposed resolution.

As I have stated before, I wholeheartedly believe in the good work of the Middle East Forum and wish to remain a faithful employee of the organization. As such, I vow to come to you with any issues immediately. I would like to note, I unequivocally believe that future turmoil of this nature is unavoidable should Gregg Roman remain an integral part of the MEF operation.

I thank you for taking my concerns and allegations seriously.

Sincerely,

Lisa Barbounis

\*Attached you will find screenshots from my March 14 conversations with both my husband and Tricia regarding Gregg's behavior in addition to screen shots directly from Gregg referencing you (Dr. Pipes) during the Hoberman Snowball proposal phone call.

I believe I may have more you want to see should I keep looking.

---

**From:** Daniel Pipes  
**Sent:** Sunday, November 4, 2018 11:34 AM  
**To:** Lisa Barbounis  
**Cc:** Marc Fink  
**Subject:** Allegations and consequences

Dear Lisa:

I am responding to the allegations you raised on Nov. 1 of improper conduct by Gregg. The Middle East Forum takes these allegations very seriously.

I have investigated this matter and found the following: You say that Gregg made unwanted sexual advances toward you. Gregg maintains that he never made such advances.

But, on learning your reaction, he acknowledges that his conduct was unacceptable and put you in a difficult position. Gregg put this in the context of calling himself a "social junkie" who seeks constant social interaction. He acknowledges this drive led to melding together his business and personal relationships with staffers, male and female alike; he also acknowledges that this mixing of business and personal relations must cease immediately.

In light of the forgoing and considering your stated wish to go on with your work at MEF, I propose several changes:

1. Gregg is no longer your supervisor; if he were to become that again in the future, it would only be with your consent.
2. During business hours, you both agree to limit yourselves, within reason, to professional relations.
3. Outside of business hours, you both agree to no contact other than using MEF e-mail: that is, no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth.

Gregg agrees that there will be no retaliation against you whatsoever, now or in the future, for you informing me of this matter. You agree not to wait months to inform me about any problems in the future concerning Gregg, but to do so immediately.

Gregg has been told and accepts that if there is a future case of a credible unwanted sexual advance by him toward a female staffer under his supervision, he will be fired immediately.

In the interests of documenting precisely what happened, I request that you send me a written account of what you already told me about Gregg's unwanted advances toward you.

Finally, I ask you to respond to three questions:

1. Do you agree to my proposed three changes? If not, please specify.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request?
3. Do you consider this matter satisfactorily resolved?

Thank you for bringing this matter to my attention, and for your cooperation.

Yours sincerely,

Daniel Pipes

cc: Marc Fink



This message was sent from outside the company by someone with a display name matching a user in your organisation. Please do not click links or open attachments unless you recognise the source of this email and know the content is safe.

Dear Daniel:

Thank you for your email. I am replying only to you because I do not think Gregg has the ability to access your email. I'm not confident that he cannot access Marc's. He had Hybros change everyone's passwords with the exception of yours and he asked that they not be changed and he had me send all of them to him. I would prefer that you share this with Marc through his personal email or confirm that he has changed his hybros issued password prior to sending it to him.

My responses to your questions are as follows"

1. Do you agree to my proposed three changes? If not, please specify. **I am in agreement with all three changes, but I will require some added changes. I would like my computer, email, and access to all banking/financial platforms changed and the assurance that Gregg will not have the ability to acquire any of my passwords and sign in under the same log on as me. I am fine with sharing those passwords with you and Marc or anyone you deem trustworthy, but I do not want to have shared access with him for any financial platform. I want assurances that he cannot change my work product nor will he have access to the ability to create any transactions under a shared log on so that it may seem as if I created them. I do not want him to have the ability to access my office if I am not there. I'm happy for you and Marc or anyone you trust to have that ability. If he is to retain the power of approving all MEF expenditures, I would like to request a second level of approvals by anyone you deem fit to handle that responsibility. There may be other things that I think of, but I want to protect myself from any ability he may have to spend MEF funds and make it look as if I have done it and for him to tamper with my work product.**
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request? **At this point, I am satisfied that MEF is taking steps to protect the interest of it's employees. I cannot say at this time that feel the matter has been handled only because I do not know the exact changes you are instituting nor do I know how these changes will affect my ability to perform my day to day duties. I do feel optimistic that you are attempting to handle the matter appropriately.**
3. Do you consider this matter satisfactorily resolved? **Again, I do not really know the exact resolution at this time but I do know that the full resolution would provide me the ability to perform my duties free from worry that anyone could tamper with my work product or make it look as if I've misappropriated or stolen funds. As it is, there is no payment or paycheck that goes out the door that Gregg does not approve. He also has the ability to create transactions under the same log-on profiles that I use. He has access to a spreadsheet that I keep with every password on it. I will not feel comfortable if he continues with that authority nor do I feel it's in the forum's best interest for him to retain that power.**

On Sun, Nov 4, 2018 at 11:34 AM Daniel Pipes <[pipes@meforum.org](mailto:pipes@meforum.org)> wrote:

Dear Marnie:

I am responding to the allegations you raised on Nov. 1 of improper conduct by Gregg. The Middle East Forum takes these allegations very seriously.

I have investigated this matter and found the following: You say that Gregg made unwanted sexual advances toward you. Gregg maintains that he never made such advances.

But, on learning your reaction, he acknowledges that his conduct was unacceptable and put you in a difficult position. Gregg put this in the context of calling himself a "social junkie" who seeks constant social interaction. He acknowledges

Case 2:19-cv-05030-JDW Document 127-16 Filed 04/20/21 Page 7 of 7

this drive led to melding together his business and personal relationships with staffers, male and female alike; he also acknowledges that this mixing of business and personal relations must cease immediately.

In light of the forgoing and considering your stated wish to go on with your work at MEF, I propose several changes:

1. Gregg is no longer your supervisor; if he were to become that again in the future, it would only be with your consent.
2. During business hours, you both agree to limit yourselves, within reason, to professional relations.
3. Outside of business hours, you both agree to no contact other than using MEF e-mail: that is, no after-hours telephone calls, texts, other e-mails, social media, drinks, meals, outings, trips, shared lodgings, and so forth.

Gregg agrees that there will be no retaliation against you whatsoever, now or in the future, for you informing me of this matter. You agree not to wait months to inform me about any problems in the future concerning Gregg, but to do so immediately.

Gregg has been told and accepts that if there is a future case of a credible unwanted sexual advance by him toward a female staffer under his supervision, he will be fired immediately.

In the interests of documenting precisely what happened, I request that you send me a written account of what you already told me about Gregg's unwanted advances toward you.

Finally, I ask you to respond to three questions:

1. Do you agree to my proposed three changes? If not, please specify.
2. Are you satisfied with how the Forum has handled this matter? If not, what additional steps do you request?
3. Do you consider this matter satisfactorily resolved?

Thank you for bringing this matter to my attention, and for your cooperation.

Yours sincerely,

Daniel Pipes

cc: Marc Fink

--

Warm regards,  
Marnie O'Brien

GC4 Consulting  
856-803-8401